

From: [Jessop, Carter](#)
To: jruyle@fs.fed.us
Cc: [Goldmann, Elizabeth](#)
Subject: Attendees for Rosemont Meeting
Date: Thursday, June 12, 2014 3:30:00 PM

Hello Jennifer,

Elizabeth Goldmann just asked me to send you this message because she's having computer problems. She asked me to give you the attendee list for the meeting with Rosemont that followed yesterday's hydrology working group meeting. She mentioned that she may have erroneously informed you that Kathy Goforth participated in the meeting rather than Kathleen Johnson for EPA. The participants that I was able to catch the names of include:

Rosemont: Kathy Arnold, Rod Pace, Jamie Sturgess,
USFWS: Jean Calhoun, Jason Douglas, Steve Spengle (by phone),
Corps: Marjorie Blaine,
USFS: Jim Upchurch, +2 others?
BLM: Tim Shannon, Karen ?,
SWCA: Chris Garrett,
EPA: Jason Brush, Kathleen Johnson, Jane Diamond, Carter Jessop

Thank you.

-Carter

Carter W. Jessop
U.S. EPA, Region 9
Environmental Review Section (ENF-4-2)
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3815
jessop.carter@epa.gov

From: [Nan S. Walden](#)
To: [Blumenfeld, Jared](#)
Cc: [sun, nelly](#); [Meranda Scott](#)
Subject: FW: CALENDAR ITEM - FW: Request for Meeting with General David Turner (UNCLASSIFIED)
Date: Monday, April 21, 2014 12:29:57 PM

Nelly:

Would you pls see that Mr. Blumenfeld sees this?

I will abide by Gen. Turner's decision but wanted Jared to know I followed thru.

Thx again to all for last meeting. If anything else comes up, I am traveling this week and best reached thru my cell at
(b) (6)

Nan

-----Original Message-----

From: Meranda Scott
Sent: Monday, April 21, 2014 12:21 PM
To: Nan S. Walden
Cc: GVP Press Forwarder; Dick Walden
Subject: FW: CALENDAR ITEM - FW: Request for Meeting with General David Turner (UNCLASSIFIED)
Importance: High

Hi Nan,

Here is the response I received from Mr. Maes. Please let me know if there is anything else you would like me to do.

Thanks,

Meranda Scott-Sturdavant
Executive Assistant
Office of Nan Stockholm Walden, J.D., Vice President & Counsel
(b) (6)
Farmers Investment Co. (FICO)/Green Valley Pecan Company PO Box 7
1525 E Sahuarita Rd
Sahuarita, AZ 85629

-----Original Message-----

From: Maes, James H SPD [[mailto:](#) (b) (6)]
Sent: Monday, April 21, 2014 12:18 PM
To: Meranda Scott
Cc: Colloton, Kimberly M COL SPL
Subject: RE: CALENDAR ITEM - FW: Request for Meeting with General David Turner (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Ms. Scott-Sturdavant,

Thank you for your email. Please note that regulatory applications pending at district offices may come up to the South Pacific Division (SPD) on appeal. To preserve his role in the appeals process, the SPD commander does not become involved in permit applications pending at district offices. Meeting requests on permit applications pending in a district should therefore be directed to the appropriate district- in this case, the Los Angeles District. I have forwarded your request to the District Commander for her awareness.

V/R,

--

James H. Maes, PMP
Chief of Staff
USACE South Pacific Division
(b) (6)

-----Original Message-----

From: Meranda Scott [<mailto:mscott@greenvalleypecan.com>]
Sent: Monday, April 21, 2014 12:04 PM
To: Maes, James H SPD
Cc: Meranda Scott
Subject: [EXTERNAL] FW: CALENDAR ITEM - FW: Request for Meeting with General David Turner
Importance: High

Good afternoon Mr. Maes,

I am following up on Nan Walden's request to have a meeting with General David Turner. She will be in CA Monday, April 28, 2014 and Tuesday, April 29, 2014. Would General Turner be available to meet late morning or early afternoon on either of those days?

Thank you for your time and assistance. I look forward to hearing from you in the near future.

Sincerely,
Meranda Scott-Sturdavant
Executive Assistant
Office of Nan Stockholm Walden, J.D., Vice President & Counsel
(b) (6)
Farmers Investment Co. (FICO)/Green Valley Pecan Company

From: Nan S. Walden
Sent: Thursday, April 10, 2014 6:48 PM
To: Maes, James H.
Cc: Meranda Scott; Dick Walden
Subject: Request for Meeting with General David Turner
Importance: High

Dear James:

Thank you for your assistance on the telephone today. As I said, my husband Dick and I are in San Francisco for several business reasons. Dick served many years on the Advisory Council for the 12th District Federal Reserve, and as an alumni was invited back for the regular meetings this week. Also we met with Regional Administrator Jared Blumenfeld of the EPA regarding the proposed Rosemont Mine in S. Arizona.

We understand that General Turner is out today and Friday and on leave next week. We would like to request a meeting when he returns at his earliest convenience, since we know that the 404 permit process and other reviews are proceeding.

Our family's agricultural companies, Farmers Investment Co. and the Green Valley Pecan Co. are one of the largest employers and landowners in the Tucson area. We have been farming in the Santa Cruz Valley, just west of the

Santa Rita Mountains for more than 65 years. We grow and process pecans and ship them worldwide. We are in our fourth generation of our family farmers and about the same with many of our employees in Arizona.

We are part of a large coalition of more than 180 businesses, nonprofit groups and organizations that oppose the proposed Rosemont Copper mine. We are not against mining in general-we have as neighbors to the west Freeport McMoran and Asarco, mine that date from the 50's and '60's. We collaborate with them on many community projects and programs. But we do oppose the Rosemont Mine because of its potential devastating impact on the quality and quantity of our drinking water; our rare flora and fauna and perennial streams in this fragile "Sky Island" ecosystem, and its impact on sacred Native American sites that contain irreplaceable prehistoric, historic, cultural and human remains.

Our economy in southern Arizona is largely tourist based; mining represents less than 1/3 of one percent of the jobs in our area. Tourism and related industries represent at least 10-12% of our economy and that number continues to grow. We do not believe that the impacts of this huge open pit mine can be mitigated.

Our Tucson City Council, our Pima County Board of Supervisors, our two local Congressman, Grijalva and Barber have all joined with the residents most affected by the mine to oppose it. We are grateful for the careful review by the USCOE and the EPA of the draft FEIS, and of the 404 permit, and for the thoughtful comment letters that both agencies have provided to the US Forest Service (USFS). On a recent site visit with Rep. Ron Barber, Rep. Pete DeFazio commented that this mine was "the worst abuse of the [1872] Mining Law I have seen in the United States."

I attach some background on our company and information from the Save the Scenic Santa Ritas Coalition. More information is available on the websites, www.savethesantaritas.org <<http://www.savethesantaritas.org>> ; and www.RosemontMineTruth.com <<http://www.RosemontMineTruth.com>> .

We are prepared to return to San Francisco any time this month to meet with the General.

Please contact me on my cell phone (b) (6) or my assistant Meranda Scott below if I cannot be reached. Thank you very much for your consideration.

Sincerely,

Nan S. Walden

Nan Stockholm Walden, J.D.
Vice President and Counsel
Farmers Investment Co. (FICO)

(b) (6)

Executive Assistant:
Meranda Scott

(b) (6)

Classification: UNCLASSIFIED
Caveats: NONE

From: [Johnson, Kathleen](#)
To: (b) (6)
Subject: FW: Scheduling Rosemont meeting
Date: Monday, June 09, 2014 11:51:00 AM

Horst,

For your consideration, Jared and some other senior federal officials are planning on attending a meeting next week in Phoenix. The meeting of the Western Regional Partnership includes, among others, Ray Suazo, Brig Gen David Turner from the Corp and possibly others that have a connection to Rosemont. (Also, just FYI, Letty Belin is also on the list of attendees). Their agenda is pretty packed, but conceivably we could schedule an hour over the lunch hour on Tuesday, June 17th. So one option might be to have the Rosemont meeting in Phoenix, with the senior leadership part at noon on the 17th followed by the more detailed and staff level discussion.

If that seems too difficult, we are also fine with scheduling the meeting for the week of June 23rd. In that event, Jared would be unable to attend, but either Jane Diamond or I and staff would attend. Thanks for all your help on this project.

Kathleen H. Johnson
Director, Enforcement Division
U.S. EPA - Region 9
75 Hawthorne Street ENF-1
San Francisco, CA 94015
415/972-3873
johnson.kathleen@epa.gov

From: [Nan S. Walden](#)
To: [sun, nelly](#); [Meranda Scott](#); [kathryn.m.liptak](#) [REDACTED]
Cc: [Gaudario, Abigail](#); [Dick Walden](#); [Kwok, Frances](#)
Subject: RE: Request for Meeting with Nan and Dick Walden week of April 7, 2014 re Rosemont Mine
Date: Monday, April 07, 2014 11:18:25 AM

Thank you. We will see you a few minutes before to allow time to clear security at 75 Hawthorne.

Nan

From: sun, nelly [<mailto:sun.nelly@epa.gov>]
Sent: Monday, April 07, 2014 11:16 AM
To: Nan S. Walden; Meranda Scott; [kathryn.m.liptak@gmail.com](#)
Cc: Gaudario, Abigail; Dick Walden; Kwok, Frances
Subject: RE: Request for Meeting with Nan and Dick Walden week of April 7, 2014 re Rosemont Mine

Excellent! I will submit your names to our Security Desk. Please bring I.D. with you to show to the guards, and then you go through security check. Once you have passed security and have been issued visitors badges, please call me at 415-947-8702 and I will escort you to Jared's office.

From: Nan S. Walden [<mailto:n>] [REDACTED]
Sent: Monday, April 07, 2014 10:55 AM
To: sun, nelly; Meranda Scott; [kathryn.m.liptak](#) [REDACTED]
Cc: Gaudario, Abigail; Dick Walden
Subject: RE: Request for Meeting with Nan and Dick Walden week of April 7, 2014 re Rosemont Mine
Importance: High

Thanks so much, Nelly. Thurs at 2:45 pm is just perfect.
For our part, it will be myself and my husband Dick Walden.
Thank you again.

Nan

Cell: (b) (6) [REDACTED]

Nan Stockholm Walden, J.D.
Vice President and Counsel
Farmers Investment Co. (FICO)

[REDACTED]
[REDACTED]
(b) (6) [REDACTED]
[REDACTED]

Executive Assistant:
Meranda Scott

[REDACTED]
(b) (6) [REDACTED]

From: sun, nelly [<mailto:sun.nelly@epa.gov>]

Sent: Monday, April 07, 2014 10:49 AM

To: Nan S. Walden; Meranda Scott; [kathryn.m.liptak](mailto:kathryn.m.liptak@ficom.com) (b) (6)

Cc: Gaudario, Abigail

Subject: RE: Request for Meeting with Nan and Dick Walden week of April 7, 2014 re Rosemont Mine

Dear Nan & Meranda:

Jared Blumenfeld forwarded your email to me; my colleague Abigail is out today. Can you meet with Jared this Thursday, April 10th @ 2:45 pm?

Thanks,

Nelly

From: Nan S. Walden <(b) (6)>

Sent: Monday, April 07, 2014 8:54:55 AM

To: Blumenfeld, Jared; Gaudario, Abigail

Cc: Meranda Scott; Kathryn M. Liptak ([kathryn.m.liptak](mailto:kathryn.m.liptak@ficom.com) (b) (6)); Dick Walden

Subject: FW: Request for Meeting with Nan and Dick Walden week of April 7, 2014 re Rosemont Mine

Abigail:

Have not heard back from you as to our request sent to you April 2 for meeting this week in San Francisco with Jared Blumenfeld. Dick and I arrive in SF Tuesday April 8 and are available Wed-Friday at the Administrator's convenience.

Pls reply to all, thank you.

Nan S. Walden

Cell (b) (6)

Nan Stockholm Walden, J.D.
Vice President and Counsel
Farmers Investment Co. (FICO)

(b) (6)

Executive Assistant:
Meranda Scott

(b) (6)

From: Nan S. Walden

Sent: Wednesday, April 02, 2014 12:15 PM

To: blumenfeld.jared@epa.gov; 'gaudario.abigail@epa.gov'

Cc: 'Dick Walden'

Subject: Request for Meeting with Nan and Dick Walden week of April 7, 2014 re Rosemont Mine

Importance: High

Dear Jared:

Dick and I are in San Francisco the week of April 7 for Dick's Federal Reserve Board Advisory Committee meeting. I spoke with Abigail today—she thought we might be able to schedule a meeting with you on days other than April 9th or 11th. I am available **Tuesday the 8th** or **Thursday the 10th**, or I could come in earlier if **Monday April 7th** is better for you. Dick will join us according to his schedule with the Fed.

We would like to update you on the Save the Scenic Santa Ritas Coalition latest comments through the USFS administrative appeals process, and on our meetings in DC this week.

Abigail can email me or text me on my cell phone at (b) (6).
Thank you very much.

Best,

Nan

Nan Stockholm Walden, J.D.
Vice President and Counsel
Farmers Investment Co. (FICO)

(b) (6)

Executive Assistant:
Meranda Scott

(b) (6)

From: [Goforth, Kathleen](#)
To: [Greczmiel, Horst](#)
Subject: RE: Rosemont Calls every other Friday beginning 6 Jun 2014
Date: Friday, May 30, 2014 3:48:00 PM

Hi, Horst –

I will be on leave next Friday, 6/6, but will accept the invitation to get the future dates on my calendar. Thanks for all you've done to facilitate these calls.

-Kathy

Kathleen Martyn Goforth, Manager

Environmental Review Section

EPA Region 9 (ENF-4-2)

75 Hawthorne Street

San Francisco, CA 94105

415-972-3521

-----Original Appointment-----

From: Greczmiel, Horst [[mailto:\(b\) \(6\)](#)]

Sent: Friday, May 30, 2014 2:17 PM

To:

CEQ CONSULTATION/REFERRAL

CEQ CONSULTATION/REFERRAL

Subject: Rosemont Calls every other Friday beginning 6 Jun 2014

When: Friday, June 06, 2014 3:00 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Call

Call-in number:

Local DC call in number : [REDACTED]

- [REDACTED] all-in number: (b) (6) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED])

From: [Gaudario, Abigail](#)
To: ["Greczmiel, Horst"](#)
Subject: RE: Rosemont Friday Calls
Date: Friday, May 30, 2014 3:29:00 PM

Hi,

Jared says he needs a quick call with you next week. How about Tuesday, June 3 at 11 (2PM your time)? Will it work?

Abigail Gaudario

Office of the Regional Administrator
US EPA, Pacific Southwest Region 9
75 Hawthorne
San Francisco, CA 94105
(415) 947-4238
(415) 947-3588 - fax
gaudario.abigail@epa.gov

From: Greczmiel, Horst [mailto: [REDACTED]]
Sent: Friday, May 30, 2014 2:24 PM

To: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
CEQ CONSULTATION/REFERRAL
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: Rosemont Friday Calls
Importance: High

This message provides the information from the calendar invite and the next steps leading up to the 6 June call:

Call-in number:

- Local DC call in number :2 (b) (6)
- For our colleagues outside the DC area, all-in number: (b) (6)

Passcode: (b) (6)

Moderator [REDACTED]

CEQ CONSULTATION/REFERRAL
[REDACTED]

Next Steps;

1. **CEQ Consultation/Referral** [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Thank you, Horst

Horst Greczmiel
Associate Director for NEPA Oversight
Council on Environmental Quality

(b) (6) [REDACTED]
[REDACTED]



Please consider the environment before printing this e-mail

From: [Jessop, Carter](#)
To: [Vogel, Mindy S -FS](#)
Cc: [Goforth, Kathleen](#); [Campbell, Rich](#); [Hagler, Tom](#); [Brush, Jason](#)
Subject: RE: Rosemont foia
Date: Thursday, April 17, 2014 2:54:00 PM

Mindy,

Thank you for your message. I've forwarded it along to the potentially interested parties here at EPA, including our counsel. Unfortunately, the attorney that is the lead for Rosemont-related matters is out of the office.

When are you hoping to send these materials to Rosemont by? Would you mind please holding off on transmitting the EPA-originated materials until our counsel has had a chance to review the situation?

Thank you.

-Carter

Carter W. Jessop
U.S. EPA, Region 9
Environmental Review Section (ENF-4-2)
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3815
jessop.carter@epa.gov

From: Vogel, Mindy S -FS [<mailto:msvogel@fs.fed.us>]
Sent: Wednesday, April 16, 2014 2:31 PM
To: Timothy Shannon (tshannon@blm.gov); Calhoun, Jean (jean_calhoun@fws.gov); Jessop, Carter
Cc: Upchurch, Jim -FS; Kaplan, Marc -FS
Subject: Rosemont foia

USFS
Consultation/
Referral

[REDACTED]

I [REDACTED]
USFS CONSULTATION/REFERRAL
[REDACTED]

I [REDACTED]

USFS Consultation/Referral

[Redacted]

[Redacted]

Please let me know if you have any concerns with the potential release of any information we have as it relates to the above requests.

Thank you.

CNF_email_sign



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From: [Maura Kwiatkowski](#)
To: ["Rod Pace"](#)
Cc: [Blumenfeld, Jared](#); jupchurch@fs.fed.us; [Ally Miller](#); [Andres Cano](#); [Anissa Ramirez](#); [Benny Gomez](#); [Evangeline Quihuis](#); [Frank Franco](#); [Jeannie Davis](#); [Jennifer Cabrera](#); [Jennifer Eckstrom](#); [Jennifer Wong](#); [Joseph Cuffari](#); [Keith Bagwell](#); [Kiki Navarro](#); [Michael Lundin](#); [Paula Maxwell](#); [Ramon Valadez](#); [Ray Carroll](#); [Richard Elias](#); [Rosie Alexander](#); [Roxanne Ziegler](#); [Sharon Bronson](#); [Shirley Lamonna](#); [Tom Ward](#)
Subject: Rosemont Copper Mitigation Preferences
Date: Monday, June 02, 2014 1:52:26 PM
Attachments: [SCA-COPIER-14060213320.pdf](#)

Good afternoon, Rod.

Please see the enclosed correspondence from Mr. Huckelberry regarding this subject.

Regards,
Maura

Maura J. Kwiatkowski
Chief Administrative Assistant to
Pima County Administrator Chuck Huckelberry
130 W. Congress Street, Floor 10
Tucson, Arizona 85701
520.724.8587



COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER
130 W. CONGRESS, FLOOR 10, TUCSON, AZ 85701-1317
(520) 724-8661 FAX (520) 724-8171

C.H. HUCKELBERRY
County Administrator

June 2, 2014

Rod Pace, President/Chief Executive Officer
Rosemont Copper Company
P. O Box 35130
Tucson, Arizona 85740

Re: **Rosemont Copper Mitigation Preferences**

Dear Mr. Pace:

In my last communication to you, I indicated Pima County would be prioritizing our preferences for additional mitigation we believe is necessary for the Rosemont Copper project. As you know, the impact is substantial and based on our Conservation Land System would require approximately 13,665 acres of habitat mitigation.

Of particular concern is the long-term sustainability of the Cienega and Davidson Creek. The County has invested millions in land conservation in the Cienega Watershed. Your proposed project has long-term adverse impacts on water resources within the Cienega Basin and causes both direct and indirect impacts.

We have highlighted in the attached exhibit our preference for continuing mitigation of these riparian and water-based environmental impacts. This package of mitigation provides opportunities to increase the number of acres conserved to 13,665 using State Trust lands only (Attachment 1). Given State support for your proposed activity, I must assume acquisition of State Trust lands through a public auction could be easily accomplished. Based on our last discussion, I understand you would desire to acquire these additional mitigation lands in two transactions, which I assume would be allowed by the federal permitting agency. I would suggest two acquisitions of approximately 5,000 acres each. A similar State Trust land auction resulted in Freeport McMoRan acquiring 8,300 acres of land for their operation and future mitigation.

Mr. Rod Pace
Re: **Rosemont Copper Mitigation Preferences**
June 2, 2014
Page 2

We certainly understand and appreciate your conservation efforts in Santa Cruz County and the Sierrita Mountains; however, these properties are not located within the basin of impact and do not minimize any indirect impacts of the mine.

Because Rosemont may need to provide additional federal mitigation requirements, the potential State Trust acquisitions have been divided into four groupings, each of which provides different benefits to consider. I attempted to exclude well-known mines and mineral deposits from the selections.

State Trust Grouping	Total GIS Acres
Davidson Canyon	2,739
Lower Cienega Creek	4,885
Santa Rita Linkage	1,675
Whetstone Riparian	1,675
Total	10,974

Attachment 1 shows each of the priority mitigation areas and their relationship or adjacency to existing conservation efforts of the County.

Davidson Canyon Additions

The Davidson Canyon additions are in an area of indirect effects of the mine. They are accessible to the public and include areas that would be vulnerable to future commercial or residential development. The additions include most of the Important Riparian Area along Davidson Canyon, as well as area identified as Biological Core in the Conservation Lands System (CLS). Long-term protection of these lands would maintain an important wildlife linkage to the Preserve and to some private lands that Rosemont has already acquired for mitigation, in addition to closing the "gap" between the Preserve and the portion of the Bar V Ranch that lies within Davidson Canyon. The land selection does not include the proposed limestone mine on Davidson Canyon. The southernmost portions of the addition include designated Critical Habitat for the jaguar.

Lower Cienega Creek Additions

These lands north of the interstate highway buffer the Preserve from existing and proposed future developments, including groundwater development. Much of the area is currently accessible to the public via existing trails or roads. North of Interstate 10, the additions are primarily uplands located in Biological Core but include a few small areas of riparian vegetation. These lands also include an area that would help maintain connectivity to the Rincon Mountains via the adjacent Mackenzie property. South of the interstate, the

Mr. Rod Pace
Re: Rosemont Copper Mitigation Preferences
June 2, 2014
Page 3

selections include Important Riparian Areas along the main stem of Cienega Creek itself and areas of adjacent Biological Core. These land selections would connect the Preserve to Las Cienegas National Conservation Area (NCA), and the portion just downstream of the NCA is considered Critical Habitat for the jaguar. Most of these lands are far from the mine and less affected than the Davidson Canyon Additions.

Santa Rita Linkage Additions

The main purpose of this land selection is to maintain connectivity for wildlife between the northern end of the Santa Rita Mountains and Davidson Canyon and to protect areas identified as Biological Core. This land selection also includes an intermittent stock tank that has in the past harbored invasive crayfish. The stock tank and contributing wash could be managed for more natural aquatic resource functions. A perennial lake (the Lake) that has been used as a public recreation area has previously been stocked with sportfish by the Arizona Game and Fish Department. The lake is located within designated Critical Habitat for the jaguar. These lands are close to the mine; and, therefore, their preservation could reduce or compensate for some of the mine's indirect impacts on recreation, land use and wildlife movement.

Whetstone Riparian Additions

The main purpose of this land selection is to protect Important Riparian Area along Wakefield Canyon and to maintain connectivity for wildlife between the Whetstone Mountains and areas to the north and east. The land selection includes areas of intermittent stream flow, springs, associated riparian vegetation and areas of Biological Core. Most of the area is within designated Critical Habitat for the jaguar and may contain suitable habitat for ocelot and yellow-billed cuckoo. The acquisitions would join the County's Empirita Ranch acquisition with adjacent federal lands. The land also includes a historically significant ranch structure. Of the four groupings, these lands are the most remote and least affected by the mine proposal.

Our priority would first be the Lower Cienega Creek acquisition of 4,885 acres, followed by Davidson Canyon at 2,739 acres; then the Santa Rita linkage, followed by the Whetstone Riparian Additions.

Water rights and water that will benefit the environment

Your purchase of water rights is also beneficial but only to the extent real, sustainable wet water is available. At our recent meeting with the Forest Service regarding our objections, Rosemont representatives heard my staff describe several additional ways that Rosemont could reduce effects of the mine on water resources, including recharging water derived

Mr. Rod Pace
Re: **Rosemont Copper Mitigation Preferences**
June 2, 2014
Page 4

from dewatering for the benefit of downstream riparian areas and modifying the design of stormwater controls to release more water downstream. These are described more fully in Attachment 2, which we provided to the Forest Service since our meeting.

Finally, we still believe the Pantano Dam, adjacent well and purchased water rights are helpful; but we would suggest that any recovered water associated with your proposed managed underground storage and recovery be conveyed in a pipeline and discharged at the Dam to assure sustainable riparian restoration within the Cienega Creek Natural Preserve.

Sincerely,

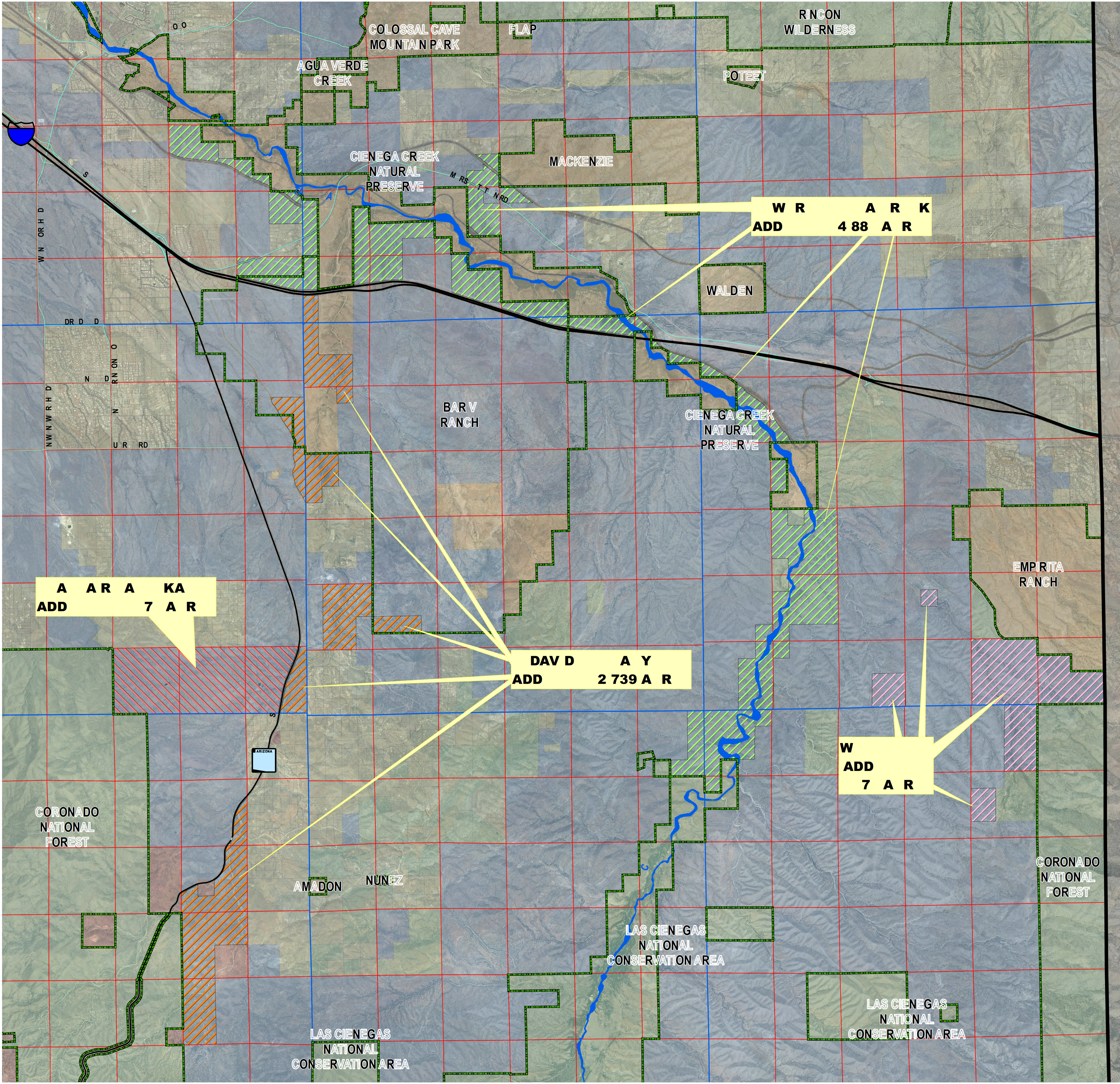


C.H. Huckelberry
County Administrator

CHH/mjk

Attachments

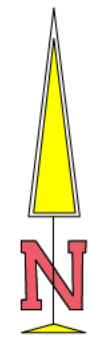
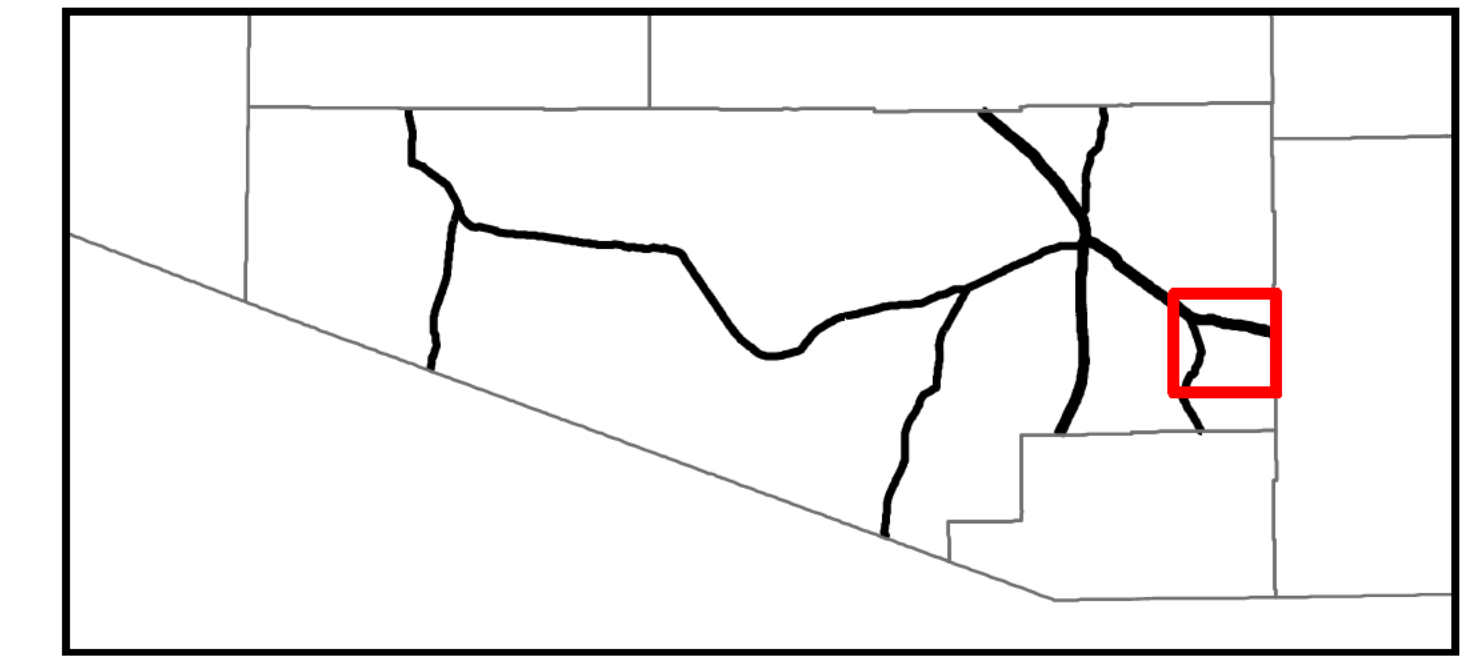
- c: The Honorable Chair and Members, Pima County Board of Supervisors
Colonel Kimberly Colloton, Los Angeles District Engineer, US Army Corps of Engineers
Jared Blumenfeld, Region IX Administrator, US Environmental Protection Agency
Jim Upchurch, Forest Supervisor, US Forest Service



Cienega Watershed: Potential State Lands Acquisitions

- Interstate Highway
- State Highway
- Major State Routes
- Major Waterways
- Private
- Section Line
- Ownership Range Line
- Legend
- Private
- Pima County
- Rosemont Copper Co
- State of Arizona
- United States of America
- Unincorporated Railroad
- Davidson Can on Additions
- Lower Cienega Creek Additions
- San a R a in age Add tions
- Whet to eAd i i ns

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ATTACHMENT 2

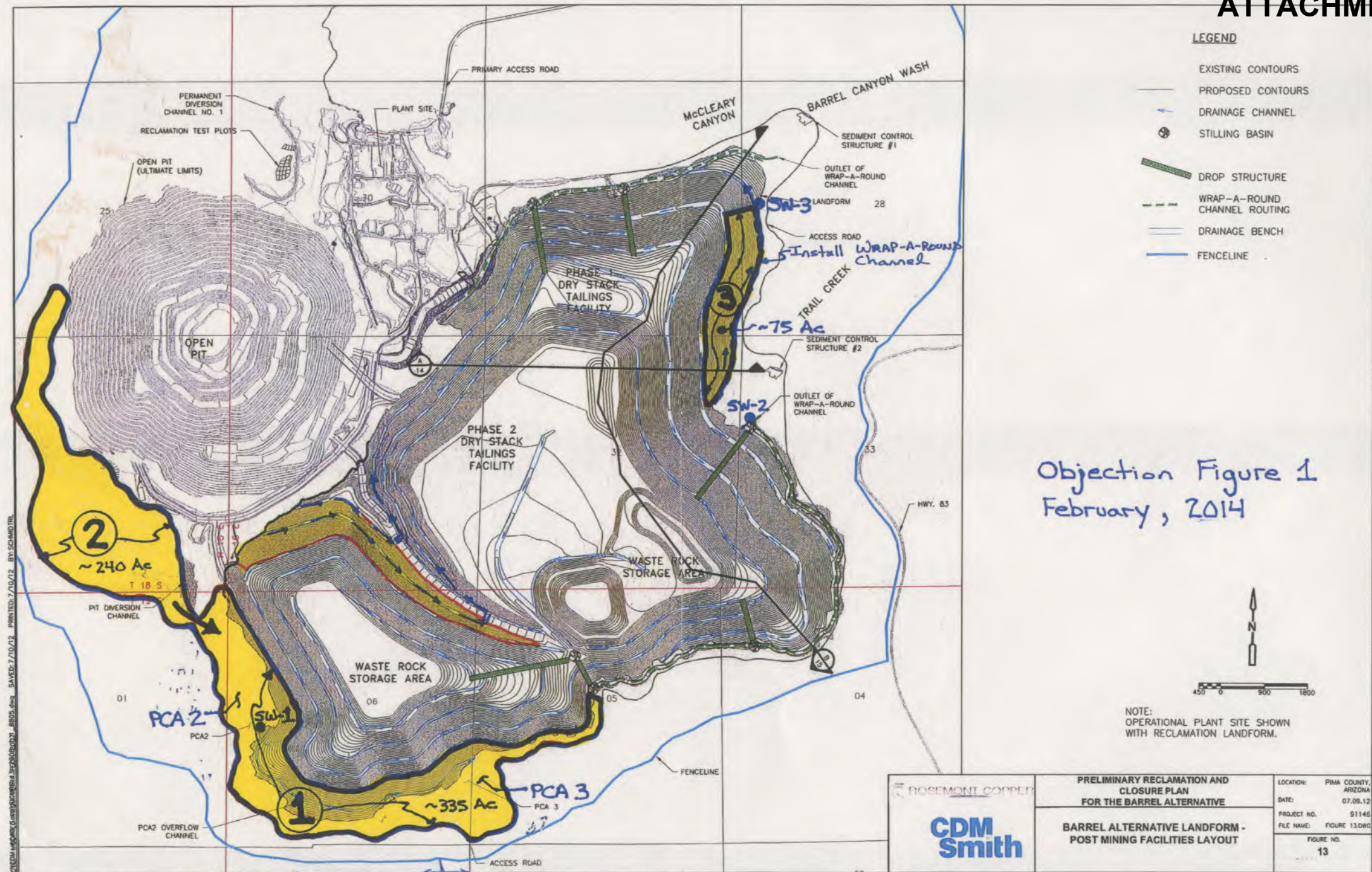
PIMA COUNTY DISCUSSION ITEMS

1. Failure to Properly Define Mine Life When Evaluating Impacts (Julia) Various public documents released for comment by the Forest Service inconsistently define the life of the proposed Rosemont mine. Until the PAFEIS and FEIS, the inconsistencies pertained to the pre-mining and post-mining periods. The prior documents defined the actual mining operation period as 20 years. For the first time, the PAFEIS expands the total mine life as ranging from 24.5 to 30 years with the active mining period ranging from 20 to 25 years. The FEIS expands active mining life to 25 years. *Will FS adjust mine life back to 20 years?*
2. Temporary cessation (Julia) Despite the high likelihood of temporary cessations and the resulting significant extensions of mine life, the FEIS and ROD fail to adequately discuss the impacts of the temporary cessations and multiple cessations. *Will dewatering and other impact-causing activities occur at the facility during the cessations? Will Forest Service supplement the FEIS to include a discussion of temporary cessation impacts and their resulting extension of mine life?*
3. Adverse transportation impacts are anticipated on county roads but are not disclosed and mitigated. (Jonathan) Traffic impacts to Sahuarita Road not disclosed, nor mitigation proposed. County roadways include but are not limited to Sahuarita Road and Santa Rita Road.
4. Elsewhere, traffic mitigation not sufficient to address safety concerns. (Jonathan)
5. Groundwater impacts and mine life (Julia, Frank): It is not clear from the record that the Forest Service considered environmental impacts, especially groundwater extraction in the Sahuarita wellfield and the dewatering in the Cienega Basin, on a 25-year active mining basis. Was the basis for modelling a 20-year or a 25-year active mining period? Will the FEIS be modified? Furthermore, if the ROD is based on improper mine life modelling periods, the ROD must limit active mine life to 20 years.
6. Downstream Replenishment of downgradient streams with groundwater from the dewatered pit (Frank). Implementing this mitigation measure will partially address immediate downgradient impacts of pit dewatering. An adaptive management scheme can be developed to pump the pit water downstream over time to store water in advance to replenish areas that would become dewatered as a result of the pit. Downgradient wells could also benefit from this mitigation measure. An AZPDES permit will be needed to meet Federal and AZ WQ standards.
7. What is the Permitting Strategy for Wells and Pipelines? (Julia) There is no discussion of the Forest Service's past or proposed efforts to permit these wells and pipelines. Indeed, the FEIS fails even to disclose the locations, size, and impacts of the dewatering and construction wells and related pipelines. There is no mention of the Forest Service

ATTACHMENT 2

permitting process required under FSM 2541.35, R3 supplement 2500-2001-1, nor of any intention to condition approval of the MPO on successful authorization of the wells and pipelines under that standard. This apparent permission to proceed without the necessary special use authorization is a new concern arising after the opportunity for public comment. Pima County recommends that the ROD be amended to condition approval of the MPO on Rosemont's receipt of special use authorization required by FSM 2451.35.

8. The Hydrologic Analysis is Inadequate and the Report Misrepresents the Hydrologic Analysis performed (Evan) Pima County clearly stated that the consultant should consider the results of a 3-hr storm (comment reference "n"), which was never done, and the FEIS implies that Pima County's concerns were addressed in the analysis they did, while they were not.
9. Potential impacts on downstream riparian and water resources for all phases of mine life are not fully disclosed (Evan, Brian) FEIS should fully analyze the runoff reduction impacts on downstream vegetation and water resources for all phases of mine life.
10. Release surface water into Trail Canyon from western and southern portion of the mine site, and allow runoff from northeastern tailings mound into Barrel Canyon (Mark) Modify the site water management plan to reduce impacts.
11. The FEIS waste rock seepage monitoring plan will not result in adequate seepage impact evaluation (Julia, Frank) Because preferential flowpaths could develop almost anywhere, there is little chance that the proposed monitoring will actually detect seepage if it occurs. Julia recommended monitoring for appearance of new, unplanned water bodies and testing.
12. Lack of proper accounting of soil salvage to ensure reclamation success.(Mark) Soil calculations are a significant underestimation of the actual soil needed. Recalculate soil needed and relate this to revegetation of the upper landform sideslopes and upper surfaces.
13. FEIS fails to disclosure impacts to Coleman's coralroot. (Brian) Barrel Alternative was chosen, in part, to avoid a population of Coleman's corralroot, but the company is proposing to divert water above the largest known population of this plant (representing 40% of all known individuals). Discuss in EIS.



Sw-1 → Sw-2
 $\frac{400 \text{ ft elev } \Delta}{20,000 \text{ ft}} = 2\%$
 WR BR excavate
 WR fill

From: [Johnson, Kathleen](#)
To: [horst.greczmie](#) (b) (6)
Cc: [Blumenfeld, Jared](#)
Subject: Rosemont
Date: Tuesday, June 03, 2014 3:24:46 PM

Horst,

Thanks for the call with Jared and me today. My contact info is below. In addition, my cell phone number is (b) (6).

Based on last week's call, our main concern is that individually each federal agency may believe that it has an obligation to do a new round of review every time Rosemont presents new information and Rosemont's opportunities to present new information seem boundless. The result is an endless loop of reviews. Hopefully, with your help, we can get to a place where the agencies can set out a time-line of "last, best offer" from which the final reviews would be made. We were hopeful that the deadline set by the Corp would be that "last call" and our preference would be to consider it as such. Failing that, a new federal family-wide last call for the project would be optimal.

Below are some specific talking points per your request. Depending on how the future meeting shapes up, EPA could be represented by either our NEPA program or wetlands program.

1. The federal agencies with statutory obligations associated with the Rosemont Copper project have committed substantial resources to efficiently moving this project through their respective permitting and review processes. While it is understandable that an applicant would petition for the right to submit additional information in the face of an unfavorable review by a permitting agency, the federal family should not be bound to committing resources to this project indefinitely simply because Rosemont has been unable to meet the reasonable deadlines they have been given.
2. The "extra" time that Rosemont has recently argued that they will use to develop further §404 mitigation is in fact time allotted for the USFWS to review the *final* project design and its potential impacts upon threatened and endangered species. As articulated by the USFWS on our 5/30 interagency call, the submission of new or modified mitigation plans during or following this review period may itself be grounds on which to recommend re-initiation of ESA consultation.
3. EPA agrees with the USFS that the further the project, including CWA §404 and ESA mitigations, diverges from what was disclosed in the Final EIS, the greater the need becomes for the publication of a supplemental or revised DEIS to ensure the USFS and Corps actions comply with NEPA.

Thanks for all your help on this project and please don't hesitate to call if we can be of any assistance.

Kathleen H. Johnson
Director, Enforcement Division
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From: [Johnson, Kathleen](#)
To: [Greczmiel, \(b\) \(6\)](#)
Cc: [Martynowicz, Trina](#); [Diamond, Jane](#)
Subject: Scheduling Rosemont meeting
Date: Monday, June 09, 2014 11:47:00 AM

Horst,

For your consideration, Jared and some other senior federal officials are planning on attending a meeting next week in Phoenix. The meeting of the Western Regional Partnership includes, among others, Ray Suazo, Brig Gen David Turner from the Corp and possibly others that have a connection to Rosemont. (Also, just FYI, Letty Belin is also on the list of attendees). Their agenda is pretty packed, but conceivably we could schedule an hour over the lunch hour on Tuesday, June 17th. So one option might be to have the Rosemont meeting in Phoenix, with the senior leadership part at noon on the 17th followed by the more detailed and staff level discussion.

If that seems too difficult, we are also fine with scheduling the meeting for the week of June 23rd. In that event, Jared would be unable to attend, but either Jane Diamond or I and staff would attend. Thanks for all your help on this project.

Kathleen H. Johnson
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